

HONORABLE ROBERT J. BRYAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

KING COUNTY, WASHINGTON; DOW
CONSTANTINE, in his official capacity as
King County Executive,

Defendants.

Case No. 2:20-cv-203 RJB

STIPULATION FOR MODIFICATION OF
ORDER GRANTING DEFENDANTS'
MOTION TO MODIFY CASE SCHEDULE
AND ORDER

Note on Motion Calendar: March 2, 2023

Plaintiff United States of America and Defendants King County and Dow Constantine
hereby stipulate, pursuant to Local Civil Rules 7(j) and 16(b)(6), as follows:

WHEREAS, Plaintiff filed this action on February 10, 2020;

WHEREAS, the current deadline for all motions related to discovery, as established in the
Court's October 31, 2022 Order Granting Defendants' Motion to Modify Case Schedule, Dkt. 60,
is March 3, 2023;

WHEREAS, the Parties have fully briefed potentially dispositive cross motions, and the
Court has noticed a hearing on those motions for March 21, 2023 at 9:30 AM;

WHEREAS, Defendant King County served its Seventh Set of Discovery Requests to the

STIPULATION FOR MODIFICATION OF ORDER GRANTING
DEFENDANTS' MOTION TO MODIFY CASE SCHEDULE AND
ORDER - 1
(Case No. 2:20-cv-203 RJB)

U.S. DEPARTMENT OF JUSTICE
1100 L St., NW
Washington, DC 20005
Tel: (202) 616-0680

1 United States of America on January 24, 2023, and Plaintiff provided its objections and responses
2 to those requests on February 23, 2023;

3 WHEREAS, the Parties currently disagree about the propriety of Defendant King County's
4 Seventh Set of Discovery Requests and Plaintiff's objections and responses, and the Parties have
5 met and conferred regarding their disagreement;

6 WHEREAS, Plaintiff is currently gathering additional information in light of the Parties'
7 meet-and-confer discussions to determine whether providing further responses to Defendant King
8 County's Seventh Set of Discovery Requests would be possible without imposing an undue burden
9 on Plaintiff;

10 WHEREAS, in light of the Parties' ongoing discussions, the Parties believe that good cause
11 exists to modify the current deadline to file all motions related to discovery by approximately one
12 week, from March 3, 2023 to March 9, 2023;

13 WHEREAS, under the Parties' stipulated proposal, the other deadlines established by the
14 Court's October 31, 2022 Order Granting Defendants' Motion to Modify Case schedule will not be
15 affected, and the Parties ask for this additional time to evaluate whether they can resolve existing
16 discovery disputes without further motions practice.

17 NOW THEREFORE, the Parties, through their respective counsel of record, do hereby
18 stipulate and agree that the deadline for all motions related to discovery should be extended by
19 approximately one week, to March 9, 2023.

20 SO STIPULATED.

21 Respectfully submitted this 2nd day of March, 2023.
22
23
24

HARRIGAN LEYH FARMER & THOMSEN LLP

NICHOLAS W. BROWN
United States Attorney

By: s/ Timothy G. Leyh

By: s/ Shane P. Cramer

By: s/ Ariel Martinez

By: s/ Ashley D. Burman

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney
General

Timothy G. Leyh, WSBA #14853
Shane P. Cramer, WSBA #35099
Ariel Martinez, WSBA #54869
Ashley D. Burman, WSBA #58754
999 Third Avenue, Suite 4400
Seattle, WA 98104
Tel: (206) 623-1700
Email: timl@harriganleyh.com
Email: shanec@harriganleyh.com
Email: arielm@harriganleyh.com
Email: ashleyb@harriganleyh.com

ALEXANDER K. HAAS
Director

JACQUELINE COLEMAN SNEAD
Assistant Branch Director

By: s/ Bradley P. Humphreys

Bradley P. Humphreys (D.C. Bar No.
988057)
Michael J. Gerardi
Benjamin Takemoto
Trial Attorney
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L Street, NW
Washington, D.C. 20005
Tel: (202) 305-0878
Fax: (202) 616-8460
E-mail: bradley.humphreys@usdoj.gov

LEESA MANION (she/her)
King County Prosecuting Attorney

By: s/ Timothy P. Barnes

Timothy P. Barnes, WSBA #29929
Senior Deputy Prosecuting Attorneys
516 Third Avenue, Suite W400
Seattle, WA 98104
Tel: (206) 477-1120
Fax: (206) 296-0191
Email: timothy.barnes@kingcounty.gov

Attorneys for Plaintiff

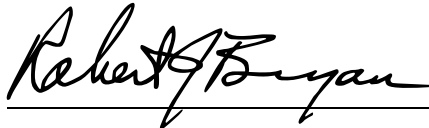
Attorneys for King County and Dow Constantine

ORDER

This matter comes before the Court on the Parties' Stipulation for Modification of Order Granting Defendants' Motion to Modify Case Schedule. Having considered the Parties' Stipulation, and good cause having been demonstrated, the Court hereby extends the deadline for all motions related to discovery to March 9, 2023.

IT IS SO ORDERED.

DATED this 2nd day of March 2023.



ROBERT J. BRYAN
United States District Judge

Presented By:

NICHOLAS W. BROWN
United States Attorney

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney
General

ALEXANDER K. HAAS
Director

JACQUELINE COLEMAN SNEAD
Assistant Branch Director

By: /s/ Bradley P. Humphreys
Bradley P. Humphreys (D.C. Bar No.
988057)
Michael J. Gerardi
Benjamin Takemoto
Trial Attorneys
United States Department of Justice
Civil Division, Federal Programs Branch

STIPULATION FOR MODIFICATION OF ORDER GRANTING
DEFENDANTS' MOTION TO MODIFY CASE SCHEDULE AND
ORDER - 4
(Case No. 2:20-cv-203 RJB)

HARRIGAN LEYH FARMER & THOMSEN LLP

By: s/ Timothy G. Leyh

By: s/ Shane P. Cramer

By: s/ Ariel Martinez

By: s/ Ashley D. Burman

Timothy G. Leyh, WSBA #14853
Shane P. Cramer, WSBA #35099
Ariel Martinez, WSBA #54869
Ashley D. Burman, WSBA #58754
999 Third Avenue, Suite 4400
Seattle, WA 98104
Tel: (206) 623-1700
Email: timl@harriganleyh.com
Email: shanec@harriganleyh.com
Email: arielm@harriganleyh.com
Email: ashleyb@harriganleyh.com

U.S. DEPARTMENT OF JUSTICE
1100 L St., NW
Washington, DC 20005
Tel: (202) 616-0680

1 1100 L Street, NW
2 Washington, D.C. 20005
3 Tel: (202) 305-0878
4 Fax: (202) 616-8460
5 E-mail: bradley.humphreys@usdoj.gov

6 *Attorneys for Plaintiff*

LEESA MANION (she/her)
King County Prosecuting Attorney

By: s/ Timothy P. Barnes

Timothy P. Barnes, WSBA #29929
Senior Deputy Prosecuting Attorneys
516 Third Avenue, Suite W400
Seattle, WA 98104
Tel: (206) 477-1120
Fax: (206) 296-0191
Email: timothy.barnes@kingcounty.gov

Attorneys for King County and Dow Constantine